Rombough, Kyrik

From: Colin Campbell [campbell@rtpenv.com]

Sent: Friday, August 29, 2008 5:04 PM

To: Rombough, Kyrik

Subject: Hyperion air permit application - follow-up supplemental information

Mr. Rombough,

As a follow-up to my email message of last night, I am attaching additional information you have requested regarding BACT for VOC emissions from storage tanks.

Thank you for your attention to this matter, and have a pleasant holiday weekend.

Colin Campbell

Summary of Costs and Emissions for Upgrading Fixed-Roof Tanks Storing Heavy Liquids

| - Juliu | hary of Costs and Emissions for Upgrading Fix | eu-Noor ranks | Storing rica | vy Elquius |
|---------|---|---------------|--------------|------------|
| | | fixed roof | IFR | IFR |
| Tank ID | | VOC | VOC | capital |
| Number | Liquid Stored | tpy | tpy | \$ |
| IP14-1 | Inalk Alkylate | 69.28 | 0.30 | 500,000 |
| IP14-2 | Inalk Alkylate | 69.28 | 0.30 | 500,000 |
| IP15-1 | Inalk C12+ Stream | 0.02 | 0.06 | 300,000 |
| IP16-1 | Straight Run Kerosene | 1.78 | 0.17 | 800,000 |
| IP16-2 | Straight Run Kerosene | 1.78 | 0.17 | 800,000 |
| IP17-1 | Straight Run Diesel | 1.43 | 0.22 | 800,000 |
| IP17-2 | Straight Run Diesel | 1.43 | 0.22 | 800,000 |
| IP17-3 | Straight Run Diesel | 1.43 | 0.22 | 800,000 |
| IP19-1 | Coker LCGO | 0.69 | 0.27 | 800,000 |
| IP19-2 | Coker LCGO | 0.69 | 0.27 | 800,000 |
| IP20-1 | DHDS ULSD Product | 2.94 | 0.35 | 1,400,000 |
| IP20-2 | DHDS ULSD Product | 2.94 | 0.35 | 1,400,000 |
| IP20-3 | DHDS ULSD Product | 2.94 | 0.35 | 1,400,000 |
| IP22-1 | Hydrocracker Diesel | 2.94 | 0.35 | 1,400,000 |
| IP22-2 | Hydrocracker Diesel | 2.94 | 0.35 | 1,400,000 |
| IP26-1 | Ethanol | 1.46 | 0.05 | 290,000 |
| IP26-2 | Ethanol | 1.46 | 0.05 | 290,000 |
| RP10-1 | Jet Fuel (HC Kerosene) | 2.93 | 0.15 | 1,400,000 |
| RP10-2 | Jet Fuel (HC Kerosene) | 2.93 | 0.15 | 1,400,000 |
| RP10-3 | Jet Fuel (HC Kerosene) | 2.93 | 0.15 | 1,400,000 |
| RP11-1 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-2 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-3 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-4 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-5 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-6 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-7 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-8 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-9 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-10 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| RP11-11 | ULSD Diesel Product | 2.60 | 0.18 | 1,400,000 |
| SS9-1 | Amine (Rich) | 0.61 | 0.06 | 1,240,000 |
| SS10-1 | Amine Swing Tank (Either Sour or Sweet) | 0.61 | 0.06 | 1,240,000 |
| SS20-1 | Kerosene Product (with Additives) | 0.13 | 0.23 | 290,000 |
| SS21-1 | Diesel Product (with Additives) | 0.10 | 0.23 | 290,000 |

From: Allen, Mike [Mike.Allen@mustangeng.com]

Sent: Friday, August 29, 2008 3:21 PM

To: 'Colin Campbell'

Cc: 'Preston Phillips'; Corky Frank External; Migliavacca, Julian

Subject: EMT-14192-009 Details of Tank Farm incineration Unit Estimate 3.1.3 / 11.1

Colin

As Additional back up for the Order of Magnitude estimates provided to Hyperion for the Tank Farm Vapor Recovery we offer the following:

The estimate is broken down into two major components:

- · The tank farm recovery incineration unit.
- Piping, Instrumentation, and electrical to recover vapor from the tanks

The two sections were estimated with two different methods. What follows will be a short discussion of the method for each section:

Vapor recovery incineration

Order of magnitude estimate for refinery facilities are normally done by a factor method the uses a cost for major tagged as a basis for the factor.

Costs are added to the base equipment cost using a factor to account for the installed commodities required for the facility.

The major equipment cost for this estimate was developed from informal pricing from a typical equipment supplier.

An estimate such as this can be generated using an overall cost factor but the factor is generally composed of the following cost elements and the percentage normally obtained from completed projects:

| 1. | Major Equipment | 15% |
|-------|--|------|
| 2. | Commodity Material and Construction Cost | 60% |
| 3. | Engineering | 15% |
| 4. | Client Cost. | 10% |
| Total | | 100% |

The overall cost factor as a multiplier on major equipment that results from this type of breakdown is 100/15 = 6.66 which rounds off **6.5**.

As further explanation for Item 2:

In a refinery the largest single component of the cost is the Commodity cost. This is broken down in the following components:

| 1. | Piping | 25% |
|----|---------------------------------|-----|
| 2. | Concrete/ Sewers and Structural | 20% |
| 3. | Instrument Electrical | 10% |
| 4. | Insulation Paint and Other | 5% |

Total 60%

These items are required because the incineration installation will require foundations, fluid and gas services, sewer services, electrical services, and associated instrument controls located remotely from the incinerator. In a refinery, all equipment and piping must be built to standardized codes typical to refinery construction (such as API) and must conform to electrical classification standards for hazardous areas.

Tank Piping / Instrument and Electrical

This part of the estimate was done as a quantity based estimate. A plot plat was used to develop estimate linear footage of piping for the recovery. Sweep gas lines were included. The cost of the vapor lines and sweep gas lines for tanks is the extension of number of tanks times linear footage per item times unit cost. The cost for headers is the total quantity in linear feet times the unit cost.

The unit cost is the all-in installed cost per linear foot of piping

All costs have been escalated by 10% because the base costs used for the estimate are 2007 costs.

Mike Allen